

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRUSTEES OF THE CHICAGO REGIONAL)
COUNCIL OF CARPENTERS PENSION FUND, et al.,)

Plaintiffs,

) Case No. 16 cv 9165

) Judge Alonso

v.

AMERICAN MECHANICAL, INC.,

Defendant.

**MOTION FOR ATTORNEY FEES/COSTS AND ENTRY OF
JUDGMENT**

Plaintiffs, by its attorney, David Whitfield, move this Honorable Court to enter Judgment against the Defendant and in support state:

1. Plaintiffs filed their complaint on September 23, 2016, seeking submission of fringe benefit reports, and payment of any outstanding contributions, due, interest, liquidated damages, and attorney fees/costs.

2. The Plaintiffs filed a motion for summary judgment claiming \$53,322.02 in amounts owed by the Defendant to the Plaintiffs on February 21, 2017.

3. On March 7, 2019, this Court granted Plaintiffs' motion for summary judgment and granted Plaintiffs' judgment in the amount of \$53,225.63. Further, this

Court stated that Plaintiffs are granted 28 days to file a motion for reasonable attorney's fees. (Exhibit A, Judgement and Docket Text)

4. The Defendant owes \$26,754.25 for necessary and reasonable attorney fees and costs which are collectible under the terms of the Collective Bargaining Agreement, the Trust Agreements and 29 U.S.C. §1132(g)(2)(D). (Exhibit B, Sworn Declaration of David Whitfield; Exhibit C, Detailed Attorney's Fees)

WHEREFORE, Plaintiffs pray that judgment be granted in the amount of \$79,979.88.

Respectively submitted,

/s/ David Whitfield
Attorney for Plaintiffs

David Whitfield
McGann, Ketterman & Rioux
111 E. Wacker Drive, Suite 2600
Chicago, IL 60601
(312) 251-9700 Fax (312) 251-9701